



Consumer Goods Forum
 c/o Ignacio Gavilan, Director of Sustainability
 22/24 rue du Gouverneur General Eboue
 Issy-Les-Moulineaux, France 92130

September 23, 2019

Dear Members of the Consumer Goods Forum:

Ten years ago, the Consumer Goods Forum (CGF) made a commitment to end deforestation in member companies' supply chains by 2020, with an emphasis on high-risk commodities such as soy, beef, palm oil, and pulp and paper. In 2014, additional companies joined this pledge as part of the New York Declaration on Forests. These commitments represented a recognition that deforestation is a serious environmental and social concern, and a major contributor to the climate crisis – the greatest existential threat to humanity and the planet. **As 2020 approaches, it is apparent that CGF companies will fail to achieve their goal of Zero Net Deforestation.**

The world watches in horror and outrage as some of the largest remaining forested areas on the planet – from the Amazon to Indonesia to the Arctic – are on fire. This destruction, a manifestation of the climate crisis, is being driven by widespread deforestation – often for agricultural commodities and industrial animal agriculture including animal feed. The IPCC and IPBES have stated that the way our food is produced and consumed is a leading driver of the crisis. It is in this context of global climate emergency that we call for CGF members to take bold and urgent action to halt deforestation, species loss, and human rights abuses within supply chains.

Alongside the fires that continue to rage across the Amazon, the recent IPCC Special Report on Climate Change and Land Use confirmed once again what has been known for years: deforestation and peatland degradation – primarily caused by an unsustainable model of industrial agricultural production – is contributing to massive greenhouse gas emissions responsible for the climate crisis. We are at a critical point in history, when fundamental changes to our global food system - both what we eat and how it is produced - are urgently needed to end deforestation, deliver forest protection and restoration, respect the rights of indigenous peoples, local communities, and workers, and tackle the climate breakdown. As the report states, “reducing deforestation and forest degradation rates represents one of the most effective and robust options for climate change mitigation.”

The IPCC report confirms that forest protection goes hand in hand with recognizing and respecting the land rights of Indigenous Peoples and local communities. In addition to driving the climate crisis, deforestation has been directly linked with gross human rights abuses, including a global epidemic of murder, violence, and

criminalization against land and environmental defenders. According to Global Witness, in 2018, 164 people were murdered, more than 3 people per week – and countless more criminalized – for defending their land. Agribusiness was the second deadliest sector.

Voluntary policies that CGF members have adopted have not translated into halting widespread deforestation, habitat loss, and human rights abuses. To the contrary, in the decade since the CGF made its Zero Deforestation commitment, rapid environmental degradation, critical habitat loss, and violence against Indigenous Peoples and local communities have all grown worse. The failure of CGF members to meet their Zero Deforestation commitment reveals the reality that rampant deforestation, violence against land, environmental and human rights defenders, and labor exploitation have become intrinsic to the extractive business model of industrial agriculture when undertaken at the scale demanded by global commodity markets. CGF members must be able to demonstrate greater efforts to reduce harm, remediate damage and redress abuses across all commodities and at the corporate group level, in addition to supporting legislative and regulatory measures in demand-side markets.

Far too often companies fail to act until civil society raises concerns about non-compliance, even though current remote sensing technology enables deforestation to be detected in real-time. Instead of taking effective measures, such as establishing comprehensive monitoring and enforcement systems, incentivizing suppliers to comply with No Deforestation, No Peat, and No Exploitation (NDPE) policies, sanctioning suppliers when they do not comply with NDPE policies, obtaining third-party verification of compliance, and making deforestation and human rights risks a matter of standard due diligence and risk assessment, too many companies are taking half-measures or are employing public relations strategies to shield themselves from reputational damage.

The pathway to forest resilience lies in protecting the rights of Indigenous Peoples and local communities, restoring the damage done to forests, and transitioning to community-centered models of production. Considering the ongoing failures of the CGF to achieve zero net deforestation by 2020, we, the undersigned, call on CGF members to take bold and urgent action to halt deforestation and redouble efforts on forest protection and ecosystem restoration, species loss, and human rights abuses within supply chains by prioritizing the following actions:

- **Reduce consumption of high-risk commodities** to only what it can source from producer groups and traders that comply with ‘no deforestation, no peat, no exploitation’ standards at the group level.
- **Communicate a mandatory requirement for CGF members’ suppliers to halt conversion of tropical rainforests for agricultural commodities.** Require all suppliers to adopt group level NDPE policies.
- **Ensure recognition and respect for local communities’ customary land rights and compliance with international standards of Free, Prior, Informed Consent (FPIC) in commodity supply chains.** Thorough due diligence, risk assessment, and monitoring systems should be established to ensure that operations and suppliers are not violating communities’ land rights and that FPIC standards are followed in accordance with international human rights norms.
- **Accelerate the enforcement of a moratorium on clearance of High Conservation Value (HCV) areas, High Carbon Stock (HCS) forests, and peatlands.** Establish comprehensive, proactive, and transparent monitoring systems that rapidly detect non-compliance across supply chains, and require implementation of the High Carbon Stock Approach for agricultural development involving land-use change. Assessments should use the Integrated HCV- HCSA Assessment Manual and be approved by the HCVRN Quality Review Panel before development.

- **Publish guidelines to address non-compliance in supply chains, including thresholds to determine the status of sourcing and suspension or termination of non-compliant suppliers, as well as formal grievance redress processes for human rights, land conflict, and labor violations.** Guidelines should include thresholds for when CGF members will suspend or terminate non-compliant group level suppliers for breaches of social and environmental requirements; conversion cut-off dates, after which any clearance would need to be restored for companies to be considered for the resumption of sourcing; time-bound recovery plans that all non-compliant suppliers must meet prior to the resumption of sourcing; and requirements for non-compliant suppliers to provide independent verification that operations meet NDPE standards prior to any resumption of sourcing.
- **Adopt human rights and grievance redress policies protecting human rights defenders from violence and intimidation, including pledging zero tolerance for murder and violence against defenders.** Implement robust human rights due diligence and grievance redress processes in accordance with the UN Guiding Principles on Business and Human Rights and require suppliers and business partners to deliver remedy for harm.
- **Update business practices to actively provide incentives and support to upstream suppliers to enable and ensure compliance,** including providing material support for suppliers to address human rights grievances as they arise and ensure buying practices are not contributing to deforestation and human rights abuses e.g., through price or timing demands.
- **Publish annual reports detailing the progress of CGF member companies.** Reports should detail how companies have proactively worked to eliminate deforestation, peatland development, and human, land, and labor rights violations from commodity supply chains and implemented time-bound plans to achieve 100% independent verification of compliance for commodity specific NDPE policies.
- **Support legislative and regulatory measures in demand-side markets to address deforestation linked to the international trade in agricultural commodities.** Voluntary company commitments alone are insufficient to create the systemic changes required to end deforestation. Regulatory measures obliging all companies to carry out supply chain due diligence provide a more level playing field for those taking the lead in eliminating deforestation from their supply chains.
- **Support and fund the necessary transition toward ecological and just food systems and large-scale forest conservation and restoration.**

Neither the planet nor the CGF can afford to wait any longer to take the necessary steps to end deforestation, rights abuses, and violence in supply chains. With the whole world watching, we strongly urge CGF members to live up to their commitment to ending deforestation in supply chains and to publicly implement the priority actions provided, by the end of the first quarter of 2020. Similarly, retailers should phase out all suppliers that fail to meet the zero-deforestation commitment by the end of 2020, while actively supporting and engaging in legitimate processes to remediate ecosystem damage and provide redress for human rights abuses.

Sincerely,

The Undersigned

Alfred Lahai Gbabai Brownell Sr. - 2019 Goldman Prize Winner for Africa
Alliance FOR RURAL DEMOCRACY/LIBERIA
Amazon Watch
Amnesty International
Center for Biological Diversity
Centre for Orangutan Protection
Child Labor Coalition
Clean Water Action | Clean Water Fund Minnesota
Compassion in World Farming USA
ELSAM
Encompass
Environment Victoria
Environmental Investigation Agency
Farm Forward
Forest Peoples Programme
Friends of the Earth Japan
Friends of the Earth US
Friends of the Orangutans Malaysia
Global Witness
Grassroots
Green Advocates International/LIBERIA
HUTAN Group
International Labor Rights Forum (ILRF)
Japan Tropical Forest Action Network (JATAN)
Jaringan Masyarakat Gambut Riau (JMGR)

Jaringan Masyarakat Gambut Sumatera (JMG-Sumatera)
Lady Freethinker
Maryknoll Office for Global Concerns
Mighty Earth
Mondiaal FNV
NATURAL RESOURCES WOMEN'S PLATFORM/LIBERIA
OPPUK
Orang Utan Republik Foundation
Orang-Utans in Not e.V. (Orangutans in Peril)
Orangutan Foundation International
Oxfam
Profundo
PUSAKA
Rainforest Action Network (RAN)
Rainforest Resource and Development Centre (RRDC)
ROSCIDET
Sarawak Campaign Committee (SCC)
Sumatran Orangutan Society
SumOfUs
Tenaganita Womens Force
The Land and Sea Institute
The Netherlands Trade Union Confederation (FNV)
The Orangutan Project-USA
Tuk Indonesia
Union of Concerned Scientists (UCS)
Westpapua-Netzwerk
Yayasan HAKA